

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

<b>MAXINE L. BEACH, on behalf of herself and all others similarly situated,</b>	:	
	:	
<b>Plaintiff,</b>	:	<b>C.A. No. 15-5942-TJS</b>
	:	
<b>v.</b>	:	<b>CLASS ACTION</b>
	:	
<b>AMERICAN HERITAGE FEDERAL CREDIT UNION,</b>	:	
	:	
<b>Defendant</b>	:	

**PLAINTIFF’S UNCONTESTED MOTION FOR PRELIMINARY APPROVAL  
OF CLASS ACTION SETTLEMENT AND NOTICE TO CLASS**

Pursuant to Fed. R. Civ. P. 23(c) and Eastern District Local Rule 23.1, and for the reasons set forth more fully in the attached Memorandum of Law, Plaintiff Maxine L. Beach moves the Court for an Order preliminarily approving the settlement of this class action, approving the form and method for providing class-wide notice and scheduling a hearing at which the following will be considered: request for final approval of the proposed settlement, entry of the Final Judgment and Order and Plaintiff’s request for approval of agreed-upon attorney’s fees and costs.

Dated: February 10, 2017

Respectfully submitted,

**FRANCIS & MAILMAN, P.C.**  
By: s/ David A. Searles  
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*Attorneys for Plaintiff and the Class*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was filed electronically and served by U.S. Mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by facsimile to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's EM/ECF System.

Dated: February 10, 2017

By: /s/ David A. Searles  
David A. Searles